

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CASE NO.**

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KYLE BANKS-MARTIN,  
Plaintiff,

Judge  
Magistrate Judge

vs.

TRANS UNION LLC; EQUIFAX  
INFORMATION SERVICES, LLC;  
and EXPERIAN INFORMATION  
SERVICES, LLC;  
Defendants.

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**TRANS UNION, LLC’S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Kyle Banks-Martin served Trans Union on or about July 16, 2021 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.
2. Attached hereto is a copy of Trans Union, LLC’s Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin County District Court, as **Exhibit E**.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 35-42.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. As of the date of this Notice of Removal, Defendants Experian Information Solutions, Inc. (improperly named as Experian Information Services LLC) (Experian) and Equifax Information Services, LLC (Equifax), have been served. Counsel for Trans Union has contacted counsel for and Experian and Equifax, and they have consented to this removal as evidenced by the consents attached hereto as **Exhibit C** and **Exhibit D**.

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

7. Notice of this removal will promptly be filed with the 4<sup>th</sup> Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4<sup>th</sup> Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

Respectfully submitted,

Date: 8/4/2021

*s/ Bradley D. Fisher*

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